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VIA ECF

Hon. Robert M. Levy
United States Magistrate Judge
United States District Court, Eastern District of New York
225 Cadman Plaza East
Brooklyn, NY 11201

**Re: *Singer v. Bank of Palestine*, 19-cv-0006 (ENV)(RML)
Anticipated Motion to Compel Discovery**

Dear Magistrate Judge Levy:

We write on Plaintiffs' behalf to advise the Court that the parties have met and conferred extensively but have nevertheless arrived at an impasse on a broad spectrum of discovery issues including BOP's refusal to (1) provide complete search terms and database queries it used to previously produce the 13 pages of spreadsheet data that constitute its entire substantive production since May 2021 and (2) retain qualified vendors to load its back-up files on to emulators of their native systems in order to conduct mutually-acceptable searches of the data.

We are prepared to file three-page letter motions on each of these distinct discovery disputes if the Court so directs, but given the scope of the disputes, the long history of the parties' exchanges on these issues, and the highly technical nature of some of these matters, we think it might be more efficient for the Court if the Plaintiffs submit a more formal omnibus motion to compel, which will set forth the full spectrum of the discovery disputes so the Court can address them holistically.

Plaintiffs will be prepared to elaborate further on both the substance of the disputes and the reasons for our proposed approach involving a more formal briefing of the issues during our upcoming status conference.

Respectfully submitted,

/s/ Gary M. Osen

cc: All counsel